

June 1, 2010

Mr. Michael Berkoff
Remedial Project Manager
U.S. Environmental Protection Agency – Region V
Superfund Division, Remedial Response Section #2.
77 West Jackson Boulevard (SR – 6J)
Chicago, Illinois 60604 - 3590

Dear Mr. Berkoff:

Re: Remedial Design Milestone for Reimbursement
12th Street Landfill Operable Unit No.4
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
Allegan and Kalamazoo County

As confirmed by your letter received on June 1, 2010, Weyerhaeuser has completed milestone b of Appendix G. Weyerhaeuser requested disbursement of funds for the Remedial Design of the 12th St. Landfill. Your letter points out that some of the disbursements request did not directly relate to the Remedial Design of the 12th St. Landfill. Costs associated with a TCRA were included as this action modified the original design. Because the construction activity goes beyond Remedial Design, the costs associated construction activities for the TCRA have been deleted. From the original submittal, the following costs are associated with the Remedial Design:

Tasks performed under contract supplement No. **L0300/302** included: Review of documents relevant to 12th St. obtained through FOIA reviews at MDEQ and USEPA Region V; identification of data gaps needed to be filled to complete the design activities; preparation of a Health and Safety Plan for pre-design investigation activities; preparation of a draft Remedial Design Work Plan meeting the requirements of Paragraphs 28a and 28b and Section III, Task I of the SOW to contain a QAPP and FSP; prepare a Quality Management Plan as required in paragraph 27a; determine landfill capacity; and perform project management. Amount spent for tasks associated with RMT Contract Supplement **L0300/302** was \$131,125. **Pre-design** studies were conducted by RMT and included onsite work of boring/well installations and surveying at a cost of \$48,292.

The scope of work included in RMT contract supplement **L0304** was intended to develop the technical basis for determining where aquatic (in-stream) versus terrestrial (floodplain or upland) cleanup criteria would apply at 12th St. Landfill. Ecological habitat and river inundation were conducted studies. River inundation studies were based on existing topography data from the 12th St. Landfill and river stage data collected by RMT. Cost for this these tasks was \$17,816.



Tasks associated contract supplement L0305 addressed responses to EPA's comment on the Remedial Design Work-plan and planning activities for the pre-design investigations for the landfill. Process of securing subcontractors and gaining access agreements was also part of this task. Total spent on this supplement by RMT was \$99,634.

Preparation of the Remedial Design Report for the landfill was the objective of contract supplement L1400. Development of the Preliminary Design Report was to include design for excavating paper residuals, grading landfill, final cover installation. Design of passive gas collection system and long term gas monitoring plan were completed. The concept of developing the landfill into an eco-park as an alternative to long-term site closure was addressed in this task. Remedial Cost for this task was \$262,643.

Weyerhaeuser transitioned from RMT to Conestoga- Rovers and Associates, inc. (CRA) as consultants at an estimated 90% + completion of the Remedial Design. Due to difficult financial situation, Weyerhaeuser sought to reduce the cost to construct the landfill and proposed alternative designs to the landfill including modifying the slope from 4H: 1V to 3H:1V and a change to the passive gas collection system following CRA's review of the RMT Pre-Final Design submittal. Although sound in technical merit, both alternatives were rejected by EPA as MDEQ could not accept modifications to the design. Additional data, paper waste strength investigation and gas emission test, was collected for inclusion in the Remedial Design. Remedial Design Report was completed by CRA and approved as well as the Redial Action Work Plan. The cost to bring the project to state of construction readiness was \$304,340.

Thiel Engineering provided a third party review of the landfill design provided by RMT and CRA. Review cost was \$1875.

With the modifications of the costs for the Remedial Design, excluding activity associated with the TCRA in the Kalamazoo River and modification of the landfill slope, the revised reimbursement costs are \$865,725.

Your comments of clarification were most helpful. We will resubmit the construction activities associated with the TCRA at the landfill with the next milestone for the 12th St. Landfill.

Respectfully submitted,

Richard Gay
Remediation Program Manager
Weyerhaeuser Company
Hot Springs, AR